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From: Patty Centofanti
Sent: Wed 7/26/2017 4:06:12 PM
Subject: NSPS OOOOa Modification of a Compressor Station 40 CFR 60.5365a(j)
Chapter 4 - Fugitives Monitoring.pdf

Thanks to all for your time to discuss OOOOa this morning. I'm sending the first of two emails related to the items discussed on our call today. Appreciate your review and comments on my notes.

This scenario relates to an existing "compressor" (pre-NSPS). The compressor itself is not being replaced; however, the compressor "driver" will be replaced. The new compressor "driver" could be gas-fired or electric, and may have a HP rating greater than the HP rating of the existing compressor "driver". Based on the rule and RTC citations below, I believe the driver replacement does not trigger a "modification" to a compressor station with regard to 40 CFR 60.5365a(j) and 60.5397a. Would appreciate confirmation of that interpretation.

40 CFR 60.5365a

(j) The collection of fugitive emissions components at a compressor station, as defined in §60.5430a, is an affected facility. For purposes of §60.5397a, a "modification" to a compressor station occurs when:

- (1) An additional compressor is installed at a compressor station; or
- (2) One or more compressors at a compressor station is replaced by one or more compressors of greater total horsepower than the compressor(s) being replaced. When one or more compressors is replaced by one or more compressors of an equal or smaller total horsepower than the compressor(s) being replaced, installation of the replacement compressor(s) does not trigger a modification of the compressor station for purposes of §60.5397a.

Page 4-227 of the attached RTC:

... “For compressor stations, we agree with some aspects of the issues raised by the commenter and have made the following revisions to the modification requirements in the final rule. We agree that an increase in the compression capacity that is not due to the addition of a compressor that would result in an increase of the overall design capacity of the compressor station is not a modification. We have also clarified that the installation of a compressor will only trigger the fugitive monitoring requirements if it is installed as an additional compressor or if it is a replacement that is of greater horsepower than the compressor or compressors that it is replacing.” ...

Thanks,

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